

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO

IN RE:

PABLO FIGUEROA PAGAN
MARIA M. ROSARIO COTTO
Debtor(s)

DORAL BANK

Movant

PABLO FIGUEROA PAGAN
MARIA M. ROSARIO COTTO
and ALEJANDRO OLIVERAS RIVERA
as DEBTORS and TRUSTEE

Respondent (s)

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* CASE NO. 09-08449-ESL

* CHAPTER 13

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DEBTORS' RESPONSE TO MOTION FOR RELIEF OF STAY

TO THE HONORABLE COURT:

NOW COME, PABLO FIGUEROA PAGAN and MARIA M. ROSARIO COTTO,
debtors, through the undersigned attorney, and very respectfully state and pray as follows:

1. Doral Bank ("Doral") filed a motion for relief from stay basically alleging that debtors are in arrears in their post-petition mortgage loan payments to said creditor.

2. The debtors hereby respectfully submit that they have initiated a mortgage loan modification process through movant's loss mitigation division, whereby this matter will be dealt with outside the Bankruptcy Court.

3. Based on the aforesaid, debtors hereby respectfully submit their response to Doral request for relief from stay stating that they hereby consent to the entry of the Order lifting the stay in favor of Doral, for the purposes of pursuing the mortgage loan

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modification through Doral loss mitigation division.

WHEREFORE, debtors respectfully request from this Honorable Court to grant this motion consenting to the motion for relief from stay filed by Doral Bank.

I **CERTIFY** that on this same date a copy of this motion was filed with the Clerk of the Court using the CM/ECF filing system, which will send notification of same to: the Chapter 13 Trustee, Alejandro Oliveras Rivera, Esq.; Sergio A. Ramirez De Arellano Law Offices, Counsel for Doral Bank; I also certify that a copy of this motion was sent via regular mail to the debtors/respondents Pablo Figueroa Pagan and Maria M. Rosario Cotto.

RESPECTFULLY SUBMITTED. In San Juan, Puerto Rico, this 9th day of December, 2011.

/s/ Roberto Figueroa Carrasquillo

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